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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/14/2022

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April 13, 2022

Via ECF

Honorable Victor Marrero
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: United States of America v. Tomas Anzaldúa, No. S1 19 Cr. 579
(VM) (S.D.N.Y. 2019)

Dear Judge Marrero:

I represent defendant Tomas Anzaldúa in the above-referenced matter. I write to request a temporary modification of the terms of Mr. Anzaldúa's pretrial release to permit him to travel briefly outside of the Southern District of Texas to attend his son's wedding in San Antonio, Texas, which is located in the Western District of Texas. We have consulted with Mr. Anzaldúa's Pretrial Services Officer and the U.S. Attorney's Office, who both advised us that they have no objection to this request.

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As the Court is aware, under the conditions of Mr. Anzaldua's bail, Mr. Anzaldua is not subject to home detention or location monitoring, *see* Dkt. 59, and Mr. Anzaldua may travel outside the Southern District of Texas for employment, *see* Dkt. 52. Consistent with his employment as a trucker, Mr. Anzaldua regularly does so, with the permission of his Pretrial Services Officer. Mr. Anzaldua has been on bail for more than two years now, and he has been in full compliance with the terms of his bail at all times.

On March 15, 2022, Mr. Anzaldua pleaded guilty to a lesser-included offense of Count One of the Superseding Indictment, and his sentencing is scheduled for July 8, 2022. *See* Dkt. 169. No changes were made to Mr. Anzaldua's conditions of release following his plea.

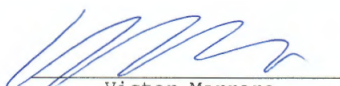
Mr. Anzaldua's son is to be married on April 21 in San Antonio, Texas, necessitating out-of-district travel from April 20 through April 22. In light of Mr. Anzaldua's excellent supervision record and his acceptance of responsibility, we believe that Mr. Anzaldua's appearance at all future proceedings would be assured with a temporary modification of the conditions of his release to permit his attendance at such an important family event. Accordingly, we respectfully request that the conditions of Mr. Anzaldua's bail be modified to permit Mr. Anzaldua to travel to San Antonio, Texas from April 20 through April 22 to attend his son's wedding.

Respectfully submitted,

Defendant's bail conditions are hereby modified to permit Tomas Anzaldua to travel to San Antonio, Texas, as requested herein.

SO ORDERED.

Dated: April 14, 2022
New York, New York


Victor Marrero
U.S.D.J.

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